

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JESSICA JONES, et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC, et al.

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

JURY DEMAND

**PLAINTIFFS' MOTION FOR LEAVE TO TAKE DEPOSITIONS OF DEFENDANTS
CHARLESBANK AND BAIN**

Plaintiffs Jessica Jones, Michelle Velotta, and Christina Lorenzen ("Plaintiffs") individually and on behalf of all others similarly situated, move this Court, pursuant to Fed. R. Civ. P. 37, Fed. R. Civ. P. 30(a)(2), and Local Rule 26.1(b), for an order granting this Motion for Leave to Take Depositions of Defendants Charlesbank and Bain ("Motion").¹ In support of their Motion, Plaintiffs rely on the contemporaneously filed memorandum of law and all supporting documents thereto, as well as the Declaration of Joseph R. Saveri ("Saveri Decl."), filed herewith.

Plaintiffs are coordinating with plaintiffs in the *Fusion Action* on 55 depositions for

¹ "Defendants" in the *Jones Action* include Varsity Brands, LLC, Varsity Spirit, LLC, and Varsity Spirit & Fashion Supplies, LLC (collectively, "Varsity"); United States All Star Federation ("USASF"), Jeff Webb, Charlesbank Capital Partners, LLC ("Charlesbank"), and Bain Capital Private Equity ("Bain") (collectively, "Defendants"). Only Varsity and USASF are Defendants in the related action *Fusion Elite All Stars, et al. v. Varsity Brands, LLC, et al.*, Case No. 2:20-cv-02600-SHL-tmp (W.D. Tenn.) ("*Fusion Action*").

current and former Varsity and USASF witnesses as well as third party witnesses in the *Fusion Action*, which was previously agreed in the Fusion Action by stipulation entered in the *Fusion Action*, ECF No. 89 (the “Fusion Stipulation”), only five days after Plaintiffs filed their Complaint, ECF No. 1.

Plaintiff have pursued a similar stipulation in the *Jones Action* to address the three additional Defendants in their action – Jeff Webb, Charlesbank and Bain. Plaintiffs have agree to have Mr. Webb’s deposition fall within the 55 allotted depositions in the Fusion Stipulation. Defendants will not allow for Charlesbank and Bain depositions other than for one Bain fact witness, two Charlesbank fact witnesses and a Rule 30(b)(6) deposition of each.

Plaintiffs now move the Court for leave to allow for 18 fact witnesses (to be allocated across Charlesbank and Bain as Plaintiffs see appropriate), and for one Rule 30(b)(6) deposition of each.

Dated: March 28, 2022

Respectfully submitted,

By: /s/ Joseph R. Saveri
Joseph R. Saveri

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CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2022, I served a copy of the foregoing document via the Court's ECF system, effecting service on all interested parties.

/s/ Joseph R. Saveri

Joseph R. Saveri